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To: "Hare,Ed, W1RFI" <w1rfi@arrl.org>
Subject: FCC Docket No. 03-104 & 04-37
Date: Thursday, April 15, 2004 9:59 AM

To the FCC:

The extension below is needed to complete the study by the NTIA.

" For several months now, the National Telecommunications & Information Administration (NTIA) has been conducting a study,

including substantial measurements, calculations and evaluations of trial locations of BPL systems, which, on information and belief, will be published and available to the public. On information and belief, the study addresses the interference potential of BPL to incumbent licensees in the high frequency and very high frequency bands: precisely the issues to be addressed in the Notice. As ARRL understands the schedule for the release of this study, it is to be released publicly on or around April 16, 2004. Though that date is approximate, it is apparent that there will, at best, be only two weeks thereafter to review and evaluate the results of that study, and to incorporate that evaluation in comments in the instant proceeding, unless the comment date is extended."

I hope the data from NTIA and other countries will be look at by the FCC.

Testing, done in other countries, will show what noise levels will be too high in the HF-VHF bands .

But will you give the testing the needed weight that it should have by you, FCC?

I think BPL is going to make it easy to get information from the users, personal info etc., using BPL it will be much easier to intercept

than any other current modes in use now. Due to the fact that the power lines will radiate RF over about 80Mhz of band.

No provider will be able to show that the BPL system will be more secure and will in reality be

less so.

The buying public should be made aware of this and to some extent should have the provider as part of any contract have it stated as part of any contract. Also

that Licensed Users of the RF bands will have priority over BPL, because BPL is FCC Part 15 rules, use even to the extent of shutting BPL down, this is a current FCC

requirement for any Part 15 use. The public should be notified in the contract of the possibility of the BPL service going down because it's under FCC Part 15 rules.

Also FCC should exempt any Licensed HF-VHF band User from interference cases brought by any local government or provider of BPL, or private citizen user of BPL,

against any FCC licensed users in the HF-VHF bands.

On July 28, 2003, General Counsel Richard B. Geltman stated on behalf of the American Public Power Association:

" Further, to the extent that interference is demonstrated, there should be an attempt to accommodate BPL, even if it means that existing communications providers may

have to share or transfer bandwidth."

Source:

http://svartifoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6514287496

He, The American Public Power Association, is wrong in who has to get out of the way when it comes to interference.. Always FCC Part 15 users must except any

interference by Licensed users, or if Part 15 users cause interference they must stop until they have removed the interference .

I hope the FCC will take this statement by Mr. Geltman into consideration as to what the power industry hopes will happen by default and that is the FCC will turn a blind

eye to interference to Licensed Users.

I believe when all the testing is done you, FCC, will see that BPL is not the best way to give internet service to the general public. That what we have currently is far better

and in the long run will also give better security to all users.

Please note that the non-interference references made by the FCC in the NPRM 04-29 that this charge is taken seriously;but does not provide meaningful protection to

Licensed Radio Services.Reduce the limits by a factor of 10 and notch out the Amateur Radio Bands would be the most effective way for both the Amateur Radio Service

and BPL providers,this would be a starting point not the end to reducing the limits.

Dennis Baumgarte

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